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*Attorneys for Plaintiffs and the Alleged Class*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**A1 ON TRACK SLIDING DOOR REPAIR  
AND INSTALLATION, INC. and  
DEBORAH SCHICK**, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

**BRANDREP LLC**, a Delaware limited  
liability company,

Defendant.

Case No. 3:21-cv-03013-SI

**JOINT STATUS REPORT**

Plaintiffs A1 On Track Sliding Door Repair and Installation, Inc. (“A1”) and Deborah Schick (“Schick,” collectively with A1, “Plaintiffs”) and Defendant BrandRep, LLC (“BrandRep” or “Defendant”) (collectively Plaintiffs and Defendant are referred to as the “Parties”) submit this Joint Status Report in response to the Court’s March 3, 2023, Case Management Order (dkt. 83).

**1. Discovery Status**

Plaintiffs’ Statement: On June 29, 2022, the Court stayed the proceeding to enable the

parties to focus their energy on resolving this matter. To date, the parties have been unable to resolve the claims in this case. As such, the Parties jointly agree, stipulate, and request that the Court lift the stay. Plaintiff proposes the following discovery schedule, which should provide sufficient time for the parties to complete all remaining fact and expert discovery.

<u>Event</u>	<u>Prior Deadline/Date</u>	<u>Proposed New Date</u>
Non-expert Discovery Cutoff	August 30, 2022	June 23, 2023
Plaintiff's Expert Disclosures	September 16, 2022	July 14, 2023
Defendant's Expert Disclosures	October 7, 2022	August 4, 2023
Rebuttal Expert Disclosures	October 21, 2022	August 18, 2023
Expert Discovery Cutoff	November 2, 2022	September 8, 2023
Plaintiff to File Motion for Class Certification	November 4, 2022	September 15, 2023
Opposition to Class Certification Due	November 18, 2022	October 6, 2023
Reply in Support of Class Certification Due	November 25, 2022	October 20, 2023
Hearing on Class Certification	December 9, 2022, 10:00 a.m.	November 10, 2023, at 10:00 a.m.

Defendant's Statement:

During the stay, Defendant engaged Christine Reilly, Esq. of the Manatt, Phelps & Phillips law firm solely in the capacity to negotiate a settlement with Plaintiffs. The Legal Solutions 2U, APC, law firm, trial counsel for Defendant, has been mostly inactive in this matter until now. The Legal Solutions 2U, APC, law firm has a major trial scheduled for July 14, 2023, in the Orange County Superior Court. Therefore, Defendant requests that the case schedule be as follows.

<u>Event</u>	<u>Prior Deadline/Date</u>	<u>Proposed New Date</u>
Non-expert Discovery Cutoff	August 30, 2022	October 23, 2023

1	Plaintiff's Expert Disclosures	September 16, 2022	November 17, 2023
2	Defendant's Expert Disclosures	October 7, 2022	December 8, 2023
3	Rebuttal Expert Disclosures	October 21, 2022	December 22, 2023
4	Expert Discovery Cutoff	November 2, 2022	January 19, 2024
5	Plaintiff to File Motion for Class Certification	November 4, 2022	January 26, 2024
6	Opposition to Class Certification Due	November 18, 2022	February 16, 2024
7	Reply in Support of Class Certification Due	November 25, 2022	February 23, 2024
8	Hearing on Class Certification	December 9, 2022, 10:00 a.m.	March 8, 2024, at 10:00 a.m.

Respectfully submitted,

Dated: March 24, 2023

**A1 ON TRACK SLIDING DOOR REPAIR AND INSTALLATION, INC. and DEBORAH SCHICK**, individually and on behalf of all others similarly situated,

By: /s/ Taylor T. Smith  
One of Plaintiffs' Attorneys

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Dated: March 24, 2023

**BRANDREP, LLC**

/s/ Patrick Blair

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*Counsel for Defendant*

**SIGNATURE CERTIFICATION**

Pursuant to Civil L.R. 5-1(i)(3) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to counsel for Defendant and that I have obtained authorization to affix his or her electronic signature to this document.

By: /s/ Taylor T. Smith

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above papers was served upon counsel of record by filing such papers via the Court's ECF system on March 24, 2023.

/s/ Taylor T. Smith